

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Tonawanda Coke Corporation - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region II

**Subject:** POLREP #25  
RV1  
Tonawanda Coke Corporation  
0201601  
Tonawanda, NY

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**From:** Peter Lisichenko, OSC

**Date:** 11/27/2018

**Reporting Period:** 11/19/18 through 11/27/18

1. Introduction

1.1 Background

<b>Site Number:</b>	A28U	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Emergency
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	10/17/2018	<b>Start Date:</b>	10/17/2018
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	NYD088413877	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	Yes
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

1 Incident Category

Abandoned coke manufacturing plant releasing hazardous substances into the environment.

1.1.2 Site Description

Tonawanda Coke Corporation is a coke manufacturing plant; approximately 160 acres in an industrial area. The facility has been in operation for approximately 100 years. The 30 currently operating coke ovens have been in use since early 1960.

1.1.2.1 Location

The facility is located at 3875 River Rd, Tonawanda, Erie County, New York. The area is an industrial area adjacent to the Niagara River. The nearest residence is located approximately 0.25 miles away.

1.1.2.2 Description of Threat

Flammable liquids contained in bulk storage tanks pose a threat of fire and explosion should they encounter an ignition source. Sodium hydroxide, a corrosive material, has been discharged onto the ground and poses a health threat to anyone who may come in contact with this material. One scrubber tower contains a pyrophoric material which may spontaneously combust if the nitrogen blanket inside the vessel is not

maintained. Drums of hydrochloric acid and solvents are being stored on an unpaved surface without secondary containment. A full removal site evaluation will be conducted and addressed following facility shutdown.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA is evaluating the Site, to identify all areas of concern and determine which facility operations will require EPA's immediate attention to circumvent a release of hazardous substances to the environment.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.2 Response Actions to Date

See previous POLREPS for additional response actions.

All boiler and process operations necessary to treat the contaminated aqueous waste streams stored/generated on-site are continuing.

ERRS contractor continued to excavate contaminated soil in the processing area. Areas completed are described as the by-products area, west of the "moat", approximately 12,000 square-feet of area has been addressed. The depth of excavation is from the surface up to 6-inches below grade and is intended to mitigate the migration of contaminants to the stormwater system. Sludge like material are being bulked in 55-gallon drums while the stained soils are staged in lined containment areas. To date, approximately 75-cubic yards has been excavated. Disposal characterization samples have been collected by the RST contractor and submitted for analysis. Excavated areas are backfilled with 2-inch crusher-run gravel (with fines). In addition to the soils, ERRS contractor continues to remove sludge and debris from secondary containment areas. The water accumulating in secondary containment is periodically being pumped and treated on-site.

The ammonia solution transfer from the south storage tank (ST23) to the weak ammonia liquor tank (PT02) continues. For this operational period, approximately 79,460 gallons of ammonia solution were transferred from the south to the north tank for treatment in the Ammonia Still System at a rate of 40-gallons per minute. In total, approximately 279,500 gallons of ammonia solution has been processed.

The process to de-energize and take off-line utilities in unused portions of the facility is underway. Electric, water, and steam has been terminated to the coke ovens and coal handling structures including Battery No. 2, Coal Handling Building, Coal Screening and Loading Station, Coal Breaking Building, and the subsurface conveyor system from the coal yard. The Town of Tonawanda had provided assistance in terminating water to the above structures on Monday, November 19, 2018. The facility fire suppression system (i.e. water hydrants) is operated on a separate system.

The Emergency & Hazardous Waste Contingency Plan for the facility is currently being updated by EPA and will be presented to the local first responder community. The plan is to identify current conditions and hazards of the Site and emergency response protocols. In developing the plan, a inventory of the fire extinguishers on-site was completed to ensure that they are in compliance with annual inspection requirements.

The removal of the coal and coke at the Site by Powers Coal & Coke has been delayed from Monday, November 26, 2018 to Wednesday, November 28, 2018 due to logistics. Powers will arrange for the loading and transportation of material from TCC to a facility in Lackawanna, New York. The material will be loaded during regular site hours and is tentatively scheduled to begin on Monday, November 26, 2018. The release of the coal tar material is pending the receipt of analytical results from the laboratory.

On Monday, November 27, 2018, EPA conducted oversight of samples collected by Site 108 PRP contractors. Five aqueous samples were collected at Site 108 from within the earthen berm secondary containment where the three coal tanks are located. The samples were collected to determine the feasibility of discharging water, within the berm, to the nearby municipal waste water treatment plant. The PRP is currently developing a work plan to stabilize and dewater the berms.

#### 2.1.3 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

TCC filed for bankruptcy on October 16, 2018. ORC continues to represent EPA's interest with TCC attorneys.

#### 2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

1. Continuing operating the boiler and supporting systems.
2. Continue running the Ammonia Still System to treat the weak ammonia liquor and other generated aqueous waste.
3. Continue to pump the contaminated water from the containment and sump areas for treatment in the Ammonia Still System.
4. Conduct a cleanup of the contaminated soil around six different sump areas to mitigate the cross contamination of surface water.
5. Move all containers and vessels containing hazardous substances, pollutants or contaminants,

which are currently improperly stored, to a containment area.

6. Continue to maintain and monitor both the plant process water and the surface storm water systems
7. Sample, analyze, remove and ship the hazardous substances, pollutants or contaminants in plant process vessels for disposal.
8. Clean and subsequently remove the plant process containment areas.
9. Winterize the vessels and pipes on the Site to protect from freezing.
10. Evaluate methodology for sealing the sumps at the site.

#### 2.2.1.2 Next Steps

EPA will continue to assess the potential public and environmental threats posed by the Site.

#### 2.2.2 Issues

Electrical and mechanical breakdowns continue to occur due to the antiquated, poor condition of the plant equipment.

### 2.3 Logistics Section

No information available at this time.

### 2.4 Finance Section

EPA is funding the removal action. The costs below include pending costs.

#### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$550,000.00	\$478,327.63	\$71,672.37	13.03%
TAT/START	\$50,000.00	\$0.00	\$50,000.00	100.00%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$600,000.00</b>	<b>\$478,327.63</b>	<b>\$121,672.37</b>	<b>20.28%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

### 2.5 Other Command Staff

No information available at this time.

## 3. Participating Entities

### 3.2 Cooperating Agencies

EPA is coordinating with, DOJ, NYSDEC and the Town of Tonawanda Water Resources Department.

## 4. Personnel On Site

One OSC, 15 ERRS personnel and 2 RST3 personnel.

## 5. Definition of Terms

No information available at this time.

## 6. Additional sources of information

## 7. Situational Reference Materials

No information available at this time.